

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>GORSKI &amp; KNOWLTON PC</b> Carol L. Knowlton (NJ Bar No. 017501981) 311 Whitehorse Avenue, Suite A Hamilton, New Jersey 08610  <i>Attorneys for Creditor and Party in Interest</i> <i>George J. Gerro</i>	
In Re:  BLOCKFI INC., <i>et al.</i> , <sup>1</sup>  Debtors.	Case No.: 22-19361 (MBK) (Jointly Administered)  Chapter 11  Hearing Date: January 9, 2023, 10:00 a.m.  Judge: The Honorable Michael B. Kaplan

**NOTICE OF MOTION  
FOR ENTRY OF AN ORDER (I) GRANTING PARTIAL RELIEF FROM THE  
AUTOMATIC STAY (11 U.S.C. §§ 362(d)(1)) AND DISCHARGE INJUNCTION (11  
U.S.C. § 524(a)) WITH RESPECT TO CERTAIN NON-CORE PROCEEDINGS; AND  
(II) EXTENDING TIME TO FILE A PROOF OF CLAIM (F.R.B.P. 3003(c)(3))**

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**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

**PLEASE TAKE NOTICE** that George J. Gerro (“Gerro”) has filed a motion entitled *Motion for Entry of an Order (I) Granting Partial Relief from the Automatic Stay (11 U.S.C. §§*

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<sup>1</sup> The relevant Debtors in these jointly administered Chapter 11 cases, along with the last four digits of each corresponding federal tax identification number, are BlockFi Inc. (0015); BlockFi Trading LLC (2487); and BlockFi Lending LLC (5017).

*362(d)(1)) and Discharge Injunction (11 U.S.C. § 524(a)) with Respect to Certain Non-Core Proceedings; and (II) Extending Time to File a Proof of Claim (F.R.B.P. 3003(c)(3))* (“Motion”).

The Motion is supported by a Certification of George J. Gerro, Memorandum of Law, and is filed concurrently with a Proposed Order.

The Motion requests that this Court allow certain related, non-core, California judicial proceedings—**except for** proceedings directly involving any collection, preliminary remedies, or enforcement of judgment—to proceed in the case of *Gerro v. BlockFi Lending LLC, et al.* (California Superior Court for the County of Los Angeles, Case No. 20BBCV00308; Court of Appeal, Second District, Division One, Case Nos. B307156; California Supreme Court, Case No. B275530). The Motion requests relief more particularly set forth in the concurrently filed Proposed Order, which is hereby incorporated by reference.

If you do not want the Court to grant this motion, or if you want the Court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: January 9, 2023

Hearing Time: 10:00 a.m. (ET)

Hearing Location: United States Bankruptcy Court for the District of New Jersey  
Clarkson S. Fisher US Courthouse  
402 East State Street  
Trenton, New Jersey 08608

Courtroom Number: 8 (Eight)

If you, or your attorney, do not take steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief. If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

Please take notice that the above-entitled Court has entered a case management order as Docket No 54, which is accessible at <https://restructuring.ra.kroll.com/blockfi/Home-DocketInfo>.

In addition to any parties that must receive notice of your filings in the above-entitled case, you may also be required to serve your response on the following non-party with a particular interest in the Motion: Scratch Services LLC 375 Alabama St., Suite 360 San Francisco, CA 94110.

Hamilton, New Jersey  
Dated: December 16, 2022

/s/ Carol L. Knowlton

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